

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY; TATUNG
COMPANY OF AMERICA, INC.; and
VIEWSONIC CORPORATION,

Defendants.

Civil Action No. 04-343-JJF

DECLARATION OF DEREK A. AUTO

I, Derek A. Auito, declare under penalty of perjury as follows:

1. I am an Associate with the law firm of McKenna Long & Aldridge LLP, 1900 K Street, N.W., Washington, D.C. 20006.
2. I have read the Protective Order entered in this case and fully understand that the Protective Order prohibits McKenna Long & Aldridge LLP ("MLA") attorneys from having access to Highly Sensitive Confidential information if such attorneys:
 - (1) have participated in, directed or supervised any patent prosecution activity related to the patents-in-suit or currently participate in, direct or supervise any patent prosecution activity involving (i) flat panel or flat panel display technology or (ii) technology related or referring to or incorporating flat panels or flat panel displays.
3. I have not participated in, directed or supervised any patent prosecution activity related to the Patents-in-Suit. In accordance with the Protective Order, I also do not currently participate in, direct, or supervise patent prosecution activity involving (i) flat panel or flat panel display technology or (ii) technology related or referring to or incorporating flat panels or flat panel displays.


4. In January 2007, I traveled to California with Mr. Michael Angert, another associate, and inspected certain Tatung Company and Tatung Company of America, Inc. (collectively "Tatung") products. During our inspection, I did not bring with me any Highly Sensitive Confidential information or documents produced by the Defendants in this case and I did not review any Highly Sensitive Confidential information or documents of Defendants in connection with the product inspection. I had my laptop with me during the inspection to take notes, but I did not retrieve from my laptop during the inspection any Highly Sensitive Confidential information or documents produced by the Defendants in this case. My laptop is password protected, and at no time, did Mr. Angert use or view any documents on my laptop.

5. Our technical expert, Mr. William Bohannon, was also present during part of the product inspection. I had no conversations with Mr. Bohannon regarding any Highly Sensitive Confidential information or documents produced by the Defendants in this case.

6. I understand it has been suggested that Mr. Angert and I must have looked at Tatung's specifications and drawings during our product inspection. That is not true. We did not have any Tatung specifications or drawings with us during the inspection. I have a bachelors degree in manufacturing systems engineering and a masters degree in industrial operations engineering; thus there is no need for me (or for Mr. Angert) to view any specifications or drawings of the Defendants when disassembling products. We knew exactly how to disassemble and reassemble the products, and had no need to view Tatung's specifications or drawings. Further, our purpose was to analyze the products in view of the claims of the patents-in-suit, thus we did not need to view any specifications or drawings because we were inspecting the actual products.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of March, 2007.



Derek A. Auito

DC:50466094.1

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on March 12, 2007, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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The undersigned counsel further certifies that copies of the foregoing document were sent by email to the above counsel on March 12, 2007, and will be sent by hand on March 12, 2007, and were sent by email on March 12, 2007, and will be sent by first class mail on March 12, 2007, to the following non-registered participants:

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